



3. Erik Harris, National Treasurer of APFA (“Harris”);
4. Larry Salas, National Vice-President of APFA (“Salas”);
5. Josh Black, National Secretary of APFA (“Black”);
6. McGaughey Reber and Associates, Inc d/b/a Diversified Credit Systems;
7. Members of, and individuals represented by the APFA;
8. IMA Finance Group, Inc.; and
9. Robert “Bob” Ross, former National President of APFA (“Plaintiff Counterclaim Defendant”).

Date: April 14, 2023

Respectfully submitted,  
K.D. PHILLIPS LAW FIRM, PLLC

By: /s/ Kerri Phillips

Kerri Phillips

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**ATTORNEY FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I certify that on this 14<sup>th</sup> day of April, a true and correct copy of the foregoing document was served on the below listed counsels of record for Defendant/Counterclaim Plaintiffs by means permitted by Rule 5(b)(2) of the Federal Rules of Civil Procedure (“F.R.C.P.”).

William Osborne  
Sanford Denison  
Michael Rake

/s/ Kerri Phillips  
Kerri Phillips